

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK**

IN RE

AIR CARGO SHIPPING SERVICES
ANTITRUST LITIGATION

MDL No. 1775

06-MD-1775 (JG) (VVP)

THIS DOCUMENT RELATES TO:
All Actions

**PLAINTIFFS' NOTICE OF MOTION AND MOTION
FOR PRELIMINARY APPROVAL OF SETTLEMENT WITH
DEFENDANT BRITISH AIRWAYS PLC**

PLEASE TAKE NOTICE THAT, upon the Declaration of Brent W. Landau in Support of Plaintiffs' Motion for Preliminary Approval of the Settlement with Defendant British Airways Plc ("British Airways") and Memorandum of Law in Support of Plaintiffs' Motion for Preliminary Approval of Settlement with Defendant British Airways Plc, along with its supporting exhibits, and all other papers and proceedings herein, Plaintiffs will move this Court on a date, time and place to be set by the Court, before the Honorable John Gleeson, United States District Judge, at the United States Courthouse, 225 Cadman Plaza East, Brooklyn, New York, pursuant to Rule 23 of the Federal Rules of Civil Procedure to enter an order:

1. Preliminarily approve the Settlement Agreement and find that its terms are sufficiently fair, reasonable, and adequate for notice to be issued to the settlement class;
2. Certify the Settlement Class as defined in the Settlement Agreement, for purposes of settlement only pursuant to Federal Rule of Civil Procedure 23(c), and authorize Plaintiffs to represent the Settlement Class;
3. Order Settlement Class Counsel to disseminate notice to the Settlement Class, upon submission to and approval by the Court of the form of notice and the notice plan; and
4. Approve The Garden City Group as Administrator of the Settlement and Citibank as Escrow Agent.

Oral argument on this motion will be held on a date and time set by the Court.

Dated: June 7, 2011

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